

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re

FIELDWOOD ENERGY LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 20-33948 (MI)

(Jointly Administered)

**CERTIFICATE OF COUNSEL TO PLAN ADMINISTRATOR'S THIRD OMNIBUS
OBJECTION TO CLAIMS PURSUANT TO SECTION 502(b) OF
THE BANKRUPTCY CODE AND RULE 3007 OF THE FEDERAL RULES OF
BANKRUPTCY PROCEDURE SEEKING TO DISALLOW CERTAIN CLAIMS**

(Related Docket Nos. 2078)

The undersigned hereby certifies as follows:

1. On October 6, 2021, the *Plan Administrator's Third Omnibus Objection To Claims Pursuant To Section 502(B) Of The Bankruptcy Code And Rule 3007 Of The Federal Rules Of Bankruptcy Procedure Seeking To Disallow Certain Claims (Multi-Debtor Claims)* [Docket No. 2078] (the "Third Omnibus Objection")² was filed with the Court by the administrator of the chapter 11 plan of the above-captioned reorganized debtors. The deadline for parties to file a response to the Third Omnibus Objection, unless extended by separate agreement filed on the Court's Docket, was November 5, 2021 (the "Objection Deadline").

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

² A capitalized term used but not defined herein shall have the meaning ascribed to it in the Third Omnibus Objection.
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2. At various times following the filing of the Third Omnibus Objection, the Plan Administrator and various claimants (collectively, the “Adjourned Claimants”) whose claims are subject to the Third Omnibus Objection entered into stipulations extending such parties’ response deadlines and/or the hearing date on the Third Omnibus Objection.

3. Attached hereto as **Exhibit 1** is an amended proposed form of order (the “Revised Proposed Order”), which indicates that the hearing on Third Omnibus Objection has been adjourned solely with respect to the Adjourned Claimants or with respect to certain claimants which did not respond prior to the Objection Deadline, which are each specifically identified in Schedule 2 to the Revised Proposed Order. In addition, the Revised Proposed Order resolves all known informal comments received by the Plan Administrator regarding the Third Omnibus Objection and no formal responses were filed on the Court’s Docket prior to the Objection Deadline.

4. Accordingly, the Plan Administrator respectfully requests entry of the Revised Proposed Order attached hereto as **Exhibit 1**. A redline reflecting changes from the proposed form of order filed with the Third Omnibus Objection to the Revised Proposed Order is attached hereto as **Exhibit 2**.

Dated: November 23, 2021

Respectfully submitted,

/s/ Michael D. Warner

Michael D. Warner, Esq.

(TX Bar No. 00792304)

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Counsel for the Plan Administrator

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of November, 2021, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Michael D. Warner
Michael D. Warner, Esq.